

Message

From: Keller, Kaitlin [keller.kaitlin@epa.gov]
Sent: 11/6/2019 7:42:34 PM
To: Keigwin, Richard [Keigwin.Richard@epa.gov]
CC: Dunn, Alexandra [dunn.alexandra@epa.gov]; Bennett, Tate [Bennett.Tate@epa.gov]; Bolen, Derrick [bolen.derrick@epa.gov]; Tyler, Tom [Tyler.Tom@epa.gov]; Stillman, Sarah [Stillman.Sarah@epa.gov]; Han, Kaythi [Han.Kaythi@epa.gov]; Fischer, David [Fischer.David@epa.gov]; Cole, Joseph E. [cole.josephe@epa.gov]; Perlis, Robert [Perlis.Robert@epa.gov]
Subject: RE: 24 c- one pager for your review - DUNN EDITS
Attachments: 24c public comment briefing document 11 6 19 v2 (003)ADDkk.docx; 24c public comment briefing document 11 6 19 v2 (003)ADDkk clean.docx

Alex- I'm attaching a redline and clean (since you might be reading on your phone) version that hopefully addresses all of your comments. Please let me know if there are any other comments.

From: Keigwin, Richard <Keigwin.Richard@epa.gov>
Sent: Wednesday, November 6, 2019 2:00 PM
To: Keller, Kaitlin <keller.kaitlin@epa.gov>
Cc: Dunn, Alexandra <dunn.alexandra@epa.gov>; Bennett, Tate <Bennett.Tate@epa.gov>; Bolen, Derrick <bolen.derrick@epa.gov>; Tyler, Tom <Tyler.Tom@epa.gov>; Stillman, Sarah <Stillman.Sarah@epa.gov>; Han, Kaythi <Han.Kaythi@epa.gov>; Fischer, David <Fischer.David@epa.gov>; Cole, Joseph E. <cole.josephe@epa.gov>; Perlis, Robert <Perlis.Robert@epa.gov>
Subject: Re: 24 c- one pager for your review - DUNN EDITS

Some additional historical context to the Q&A document already on the web:

Ex. 5 Deliberative Process (DP)

Rick Keigwin
Director, Office of Pesticide Programs
U.S. Environmental Protection Agency
Phone: 703-305-7090
Website: www.epa.gov/pesticides
Sent from my iPhone

On Nov 6, 2019, at 1:52 PM, Keller, Kaitlin <keller.kaitlin@epa.gov> wrote:

On it.

Sent from my iPhone

Kaitlin Keller, Special Assistant
EPA Office of Chemical Safety and Pollution Prevention

On Nov 6, 2019, at 1:49 PM, Dunn, Alexandra <dunn.alexandra@epa.gov> wrote:

Important Edits here and we need to ADD A SECTION ON COMMUNICATIONS AND OUTREACH.

Ex. 5 Deliberative Process (DP)

Alexandra Dapolito Dunn, Esq.
Assistant Administrator
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency
(202) 564-2910
dunn.alexandra@epa.gov

From: Keller, Kaitlin <keller.kaitlin@epa.gov>
Sent: Wednesday, November 6, 2019 12:28 PM
To: Keigwin, Richard <Keigwin.Richard@epa.gov>; Bennett, Tate <Bennett.Tate@epa.gov>
Cc: Dunn, Alexandra <dunn.alexandra@epa.gov>; Bolen, Derrick <bolen.derrick@epa.gov>; Tyler, Tom <Tyler.Tom@epa.gov>; Stillman, Sarah <Stillman.Sarah@epa.gov>; Han, Kaythi <Han.Kaythi@epa.gov>; Fischer, David <Fischer.David@epa.gov>; Cole, Joseph E. <cole.josephe@epa.gov>; Perlis, Robert <Perlis.Robert@epa.gov>
Subject: RE: 24 c- one pager for your review

Following up on a question from Tate.

A previous one-pager noted:

In apparent contradiction to the plain text of section 24(c), a response to an EPA Q&A document (available online) as to whether states could “use Section 24(c) to impose more restrictive measures than are on a section 3 label?” -- EPA states that “[y]es, under certain circumstances states may impose more restrictive measures than are on section 3 labels, or limit use to a subset of uses on section 3 labels.”

Joe/Bob-Can OGC weigh in on how to reconcile the language in the Q&A document?

From: Keller, Kaitlin
Sent: Wednesday, November 6, 2019 12:11 PM
To: Keigwin, Richard <Keigwin.Richard@epa.gov>; Bennett, Tate <Bennett.Tate@epa.gov>
Cc: Dunn, Alexandra <dunn.alexandra@epa.gov>; Bolen, Derrick <bolen.derrick@epa.gov>; Tyler, Tom <Tyler.Tom@epa.gov>; Stillman, Sarah <Stillman.Sarah@epa.gov>; Han, Kaythi <Han.Kaythi@epa.gov>; Fischer, David <Fischer.David@epa.gov>; Cole, Joseph E. <cole.josephe@epa.gov>; Bob Perlis <Perlis.Robert@epa.gov> <Perlis.Robert@epa.gov>
Subject: RE: 24 c- one pager for your review

Here you go.
Looping in OGC as discussed.

From: Keigwin, Richard <Keigwin.Richard@epa.gov>
Sent: Wednesday, November 6, 2019 8:13 AM
To: Bennett, Tate <Bennett.Tate@epa.gov>
Cc: Dunn, Alexandra <dunn.alexandra@epa.gov>; Keller, Kaitlin <keller.kaitlin@epa.gov>; Bolen, Derrick <bolen.derrick@epa.gov>; Tyler, Tom <Tyler.Tom@epa.gov>; Stillman, Sarah <Stillman.Sarah@epa.gov>; Han, Kaythi <Han.Kaythi@epa.gov>; Fischer, David <Fischer.David@epa.gov>
Subject: Re: 24 c--for your review

OPP will have something to Kaitlin shortly.

Rick Keigwin
Director, Office of Pesticide Programs
U.S. Environmental Protection Agency
Phone: 703-305-7090
Website: www.epa.gov/pesticides
Sent from my iPhone

On Nov 6, 2019, at 8:02 AM, Bennett, Tate <Bennett.Tate@epa.gov> wrote:

I think Kaitlin was working on one for us earlier this week!

Sent from my iPhone

On Nov 6, 2019, at 8:01 AM, Dunn, Alexandra <dunn.alexandra@epa.gov> wrote:

Do we have a one pager that can go on top of the draft FRN and the Memo for comment to go home with the Administrator today? If we don't, Kaitlin can you pull one together? Kaythi, you were updating the comms plan. That would be maybe something to run by Corry again.

Alexandra Dapolito Dunn, Esq.
Assistant Administrator
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency
(202) 564-2910
dunn.alexandra@epa.gov

From: Keller, Kaitlin <keller.kaitlin@epa.gov>
Sent: Tuesday, November 5, 2019 1:13 PM
To: Dunn, Alexandra <dunn.alexandra@epa.gov>; Keigwin, Richard <Keigwin.Richard@epa.gov>; Bennett, Tate <Bennett.Tate@epa.gov>; Bolen, Derrick <bolen.derrick@epa.gov>
Cc: Tyler, Tom <Tyler.Tom@epa.gov>; Stillman, Sarah <Stillman.Sarah@epa.gov>; Han, Kaythi <Han.Kaythi@epa.gov>; Fischer, David

<Fischer.David@epa.gov>

Subject: RE: 24 c--for your review

Alex—as requested, I’m attaching the latest version of the FRN for your review. The comment period in this document also will need to be updated to 90 days.

From: Dunn, Alexandra <dunn.alexandra@epa.gov>

Sent: Tuesday, November 5, 2019 1:05 PM

To: Keigwin, Richard <Keigwin.Richard@epa.gov>;

Bennett, Tate <Bennett.Tate@epa.gov>; Bolen, Derrick
<bolen.derrick@epa.gov>

Cc: Tyler, Tom <Tyler.Tom@epa.gov>; Stillman, Sarah

<Stillman.Sarah@epa.gov>; Han, Kaythi

<Han.Kaythi@epa.gov>; Fischer, David

<Fischer.David@epa.gov>; Keller, Kaitlin

<keller.kaitlin@epa.gov>

Subject: RE: 24 c--for your review

Importance: High

Final version – As we are now going out with a 90-day comment period, Andrea Drinkard had asked if we could wait until the following week (week of 11/18) instead. Let’s talk in comms meeting.

Of course final tweaks welcome. Separately I will fwd to Brittany Bolen, Matt Leopold, and Tate Bennett (again!).

<24c public comment briefing document 11 6 19 v2 (003)ADD.docx>